

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the  
Liquidation of Bernard L. Madoff Investment  
Securities LLC,

Plaintiff,

v.

CITRUS INVESTMENT HOLDINGS LTD.,

Defendant.

Adv. Pro. No. 10-04471 (SMB)

**STIPULATION EXTENDING TIME TO RESPOND**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein,  
that the time by which defendant Citrus Investment Holdings Ltd. may move, answer or  
otherwise respond to the Complaint is extended up to and including January 16, 2015.

The pre-trial conference will be adjourned from September 17, 2014, at 10:00 a.m. to  
February 25, 2015, at 10:00 a.m. This extension is the eighteenth extension of the date to move,  
answer or otherwise respond to the Complaint.

Nothing in this Stipulation is a waiver of Defendant's right to request from the Court a further extension of time to answer, move or otherwise respond and/or the Trustee's right to object to any such request.

Undersigned counsel for the Defendant: (i) expressly represents that service of the Summons and Complaint in the above-captioned adversary proceeding was properly effected on the Defendant, and (ii) expressly represents that they have the authority to, and hereby waive any defenses based on insufficiency of process or insufficiency of service of process of the Summons and Complaint on behalf of Defendant.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation, any objection to jurisdiction of this Court or to venue.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original. This Stipulation is entered into pursuant to the Order Granting Supplemental Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial Conferences (Adv. Pro. No. 08-01789 (SMB), Dkt. No. 7037).

This Stipulation may be modified by written agreement between counsel for the parties for good cause shown.

Dated: July 7, 2014  
New York, New York

/s/ Benjamin D. Pergament  
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Benjamin D. Pergament  
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Liquidation of Bernard L. Madoff Investment  
Securities LLC and Estate of Bernard L.  
Madoff*

/s/ Brian H. Polovoy  
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